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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY VILLEGAS,

Defendant.

2:13-CR-355-GMN-CWH

**Unopposed Motion for an Extension of
Time to File a Notice of Supplemental Case
regarding *Honeycutt*
(First Request)**

This Motion to Extend Time is the first request. LR IA 6-1.

The United States of America respectfully moves this Court for an extension of time to file a Notice of Supplemental Case regarding *United States v. Thompson*, -- F. 3d. --, Nos. 18-30206 and 18-30208, 2021 WL 8000686 (9th Cir. Mar. 3, 2021), interpreting *Honeycutt v. United States*, 137 S. Ct. 1626 (2017). The government is unaware of any deadline to respond to Gregory Villegas's Notice of Authority Supporting his Opposition to Government's Forfeiture Request of \$5,261,218 (ECF No. 433). The government requests the extension of time to and including Friday, April 23, 2021.

The reasons are (1) *Thompson* is not a final decision since the Ninth Circuit granted an extension of time to file a petition for rehearing and suggestion for rehearing en banc to and including May 10, 2021; (2) The government wishes to cite relevant authority about the applicability of the *Thompson* decision; (3) The proposed Notice will go through numerous government levels of review before filing, if any filing occurs; (4) On or about March 18, 2021, the government requested, and Wendi Overmyer, Assistant Federal Public Defender,

1 and counsel for Gregory Villegas, agreed to the extension of time; and (5) This Motion is
2 not submitted solely for the purpose of delay or for any other improper purpose.

3 This Court should grant an extension of time to, and including, April 23, 2021.

4 DATED: March 22, 2021.

5 CHRISTOPHER CHIOU
6 Acting United States Attorney

7 /s/ Daniel D. Hollingsworth
8 DANIEL D. HOLLINGSWORTH
9 Assistant United States Attorney

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11 **IT IS SO ORDERED.**

12 Dated this 23 day of March, 2021.

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15 Gloria M. Navarro, District Judge
16 UNITED STATES DISTRICT COURT
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